

Exhibit 11

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

)
)
)
)
)
) Case No.:
) 3:17-cv-00939-WHA

ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF JAMES HASLIM
San Francisco, California
Tuesday, April 18, 2017
Volume 1

Reported by:
RACHEL FERRIER, CSR No. 6948
Job No. 2597892
PAGES 1 - 112

Page 1

1 identical? 09:31:08

2 A It depends on the part, the nature of the part. 09:31:08

3 If the part was designed by requirements, if it was a 09:31:11

4 simple part, maybe it would not be so surprising. 09:31:14

5 Q Could be, though? 09:31:16

6 A Perhaps. 09:31:17

7 Q Okay. Who hired you at Tyto LiDAR? 09:31:18

8 A I'm not sure. I believe it would be Brent 09:31:29

9 Schwartz. 09:31:31

10 Q You are not sure who hired you? 09:31:32

11 A No. 09:31:35

12 Q How did you come to get the job? 09:31:37

13 A I spoke with a handful of people, but just in my 09:31:39

14 job today, I can't say -- it's hard for me to articulate 09:31:44

15 who hires people at our company. I would say Brent 09:31:48

16 Schwartz would be the hiring manager. In that case, I 09:31:51

17 could say it was Brent Schwartz. 09:31:54

18 Q So you said you spoke with a handful of people. 09:31:55

19 Who did you speak with? 09:31:58

20 A So I spoke with Brent Schwartz. I spoke with 09:31:59

21 Ognen -- no. What is his name. Soren Juelsgaard, and 09:32:04

22 I -- I did also, around the same time, speak with 09:32:12

23 Anthony Levandowski. 09:32:15

24 Q So when you were looking to get hired by Tyto 09:32:15

25 LiDAR, you spoke with Brent Schwartz, Anthony 09:32:22

1 Levandowski, and Soren Juelsgaard; is that right? 09:32:24

2 A Yes. 09:32:28

3 Q And what did Mr. Levandowski tell you about the 09:32:31

4 job? 09:32:36

5 A I don't recall him telling me much of anything 09:32:38

6 about the job. I think we were chatting, and it felt 09:32:40

7 more like he was just kind of checking me out. 09:32:43

8 Q And why was he involved in your hiring process 09:32:45

9 with Tyto LiDAR? 09:32:49

10 A I don't know if he was involved with my hiring 09:32:50

11 process, but we did spoke -- speak at similar time with 09:32:52

12 these other people. 09:32:56

13 Q So you joined Tyto in September 2012; right? 09:32:57

14 A Yes. 09:33:28

15 Q And you worked out of Mr. Levandowski's building 09:33:29

16 in Berkeley when you joined; right? 09:33:33

17 A I worked out of 2201 Dwight Way when I joined, 09:33:35

18 yes. 09:33:41

19 Q Which was -- 09:33:41

20 A I believe that could have been his building. I 09:33:41

21 don't know for sure. 09:33:44

22 Q At some point Tyto LiDAR moved to an address in 09:33:44

23 San Leandro; right? 09:33:49

24 A Yes. 09:33:50

25 Q Do you know why it moved? 09:33:50